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Amendment and/or Response
Reply to Office action of 27 October 2003

REMARKS / DISCUSSION OF ISSUES

Claims 1-16 are pending in the application.

The Examiner is respectfully requested to state whether the drawings are acceptable.

The Office action rejects:

claims 1-3, 5, 7, 12-14, and 16 under 35 U.S.C. 102(b) over Abraham et al. (USP 5,148,481, hereinafter Abraham); and

claims 4, 6, 8-11, and 15 under 35 U.S.C. 103(a) over Abraham and Sutikno et al. ("Design and Implementation of Arithmetic processor F2155 for Elliptical Curve Cryptosystems", hereinafter Sutikno).

The Applicants respectfully traverse this rejection.

In the Applicants' independent claims 1, 7, and 12, upon which each of the other claims depend, the Applicants claim a system and method wherein cryptographic operations are performed in a link-layer device.

The Office action relies upon Abraham for teaching a link layer device that provides cryptographic items, based on commands or parameters provided by a node controller. The Applicants respectfully traverse this characterization of Abraham.

The Office action identifies Abraham's reference item 61 in FIG. 3 as corresponding to the Applicants' claimed link layer access device (Office action, page 2, last line). The Office action also identifies Abraham's FIG. 4 as a node controller that controls the link layer access device, and, contradictorily, identifies the IC reader 67 of FIG. 3 (misindentified as FIG. 2) as the link-layer access device (Office action, page 3, lines 1-7).

The Applicants respectfully note that Abraham's item 61 differs from Abraham's item 67, and both items cannot be said to correspond to the Applicants' (singular) link-level access device.

The Applicants further note that the Abraham's cryptographic module 31 resides within the Abraham's node controller 29, as illustrated in Abraham's FIG. 4, and this node controller is identified in the Office action as the controller that controls Abraham's link-level access device. Given that Abraham's node controller 29, and not the devices 61 or 67, contains the cryptographic module, it cannot be said that Abraham's devices 61 or 67

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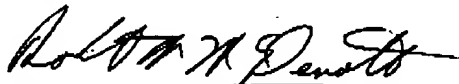
correspond to the Applicants' claimed link-level access device that provides cryptographic operations.

Because the Office action fails to identify a consistent or coherent set of elements in Abraham corresponding to the Applicants' claimed invention, the Applicants respectfully traverse the Examiner's rejection of each of the claims over Abraham, and respectfully requests the Examiner's reconsideration of these rejections.

In view of the foregoing, the Applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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